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UNITED STATES DISTRICT COURT

DISTRICT OF UTAH

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL KIRK MOORE,

Defendant.

**Motion for Review of Detention  
Based upon Change of  
Circumstances**

Case No. 2:23-CR-00010HR

Magistrate Judge Jared Bennett

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I, the defendant, Michael Kirk Moore, appearing pro se, hereby move this Honorable Court, pursuant to 18 U.S.C. § 3142(f)(2), to review the order detaining me in the above-entitled matter. Pursuant to §3142(f)(2), a detention hearing “may be reopened, before or after a determination by the judicial officer, at any time before trial, if the judicial officer finds that information exists that was not known to the movant at the time of the hearing and that has a material bearing on the issue of whether there are conditions of release that will reasonably assure the appearance of such person as required and the safety of any other person in the community.” 18 U.S.C. §3142(f)(2).

I appeared before this court on January 26, 2023, for an initial appearance. At that time, I was granted pretrial release under certain conditions. On May 26, 2023, I appeared before this Court to answer for violations of pretrial release, specifically, for failure to be

processed by the United States Marshals, failure to turn over financial records for the Plastic Surgery Institute, and failure to surrender my passport. At the time of the hearing, my United States Pretrial Officer testified that I had in fact provided adequate financial records and therefore allegation 2 was dismissed. The Court found that I was in violation of my pretrial release for failure to be processed by the United States Marshals and failure to surrender my passport, and I was taken into custody. There are currently material changes in circumstances, which warrant a reopening of the matter of detention.

1. I have now been fully processed by the United States Marshals, including the submission of my DNA, and therefore Allegation 1 is now moot.
2. I am prepared to surrender my passport immediately.
3. I am further prepared to follow any and all conditions of release set by this Court.
4. I request that the Court hold an expedited hearing on this matter.

Because I have now been processed by the United States Marshals and am willing to turn in my passport, in addition to following any other conditions of release set by the Court, there is now a material change in circumstances and for this reason, I request that the Court schedule a hearing to review my detention status.

DATED this 26<sup>th</sup> Day of May, 2023.

/s/ Dr. Michael Kirk Moore  
MICHAEL KIRK MOORE  
Defendant